

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
AT KANSAS CITY

IN RE:)	
)	
LAKESHORE FARMS, INC.,)	Case No. 18-50077-BTF11
)	CHAPTER 11
DEBTOR.)	
_____)	

SUPPLEMENT TO EMERGENCY MOTION FOR ENTRY OF INTERIM ORDER
PURSUANT TO 11 U.S.C. § 363 AND FED R. BANKR. PROC. 4001
CONCERNING THE USE CASH COLLATERAL AND
PROVIDING FOR ADEQUATE PROTECTION
(Doc 12)

COMES NOW the undersigned counsel, Joanne B. Stutz of Evans & Mullinix, P.A. and submits the attached Budget as a supplement to the Emergency Motion for Entry of Interim Order Pursuant to 11 U.S.C. §363 and Fed. R. Bankr. Proc. 4001 Concerning the Use of Cash Collateral and Providing for Adequate Protection filed on March 1, 2018 (Doc 12) which is a legible copy of the budget.

Respectfully Submitted:

EVANS & MULLINIX, P.A.

/s/ Joanne B. Stutz

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 2018,, a true and correct copy of this Rule 2015-A Statement was electronically filed with the court using the CM/ECF system which sent notification to all parties of interest participating in the CM/ECF system on the date of this filing.

/s/ Joanne B. Stutz

Joanne B. Stutz

ARM FULL FARM BUDGET

<u>Expense</u>	<u>Arm</u>	<u>Other</u>	<u>3d Party</u>	<u>Total</u>
Custom fertilizer				\$0.00
Fuel	\$105,037.00			\$105,037.00
Fungicide		\$84,028.00		\$84,028.00
Harvesting	\$245,086.00			\$245,086.00
Herbicide		\$225,339.00		\$225,339.00
Insecticide			\$135,562.00	\$135,562.00
Insurance				\$0.00
Labor	\$52,518.00			\$52,518.00
Misc.				\$0.00
Repairs	\$49,017.00			\$49,017.00
Seed		\$217,076.00		\$217,076.00
Sub-Total	\$451,658.00	\$526,443.00	\$135,562.00	\$1,113,663.00
Cash Rent	\$1,724,583.00		\$118,222.00	\$1,842,805.00
Equipment Lease	\$39,346.00			\$39,346.00
Equipment Lease	\$7,450.00			\$7,450.00
Equipment Lease	\$8,867.00			\$8,867.00
Equipment Lease	\$17,500.00			\$17,500.00
Insurance				\$0.00
Irrigation	\$40,000.00			\$40,000.00
				\$0.00
Total:	\$2,289,404.00	\$526,443.00	\$253,784.00	\$3,069,631.00

The above budget has been prepared by ARM, the DIP lender, and identifies who will be advancing credit for the line items. In addition to these items, Debtor will incur the following obligations, which total \$284,342.35:

<u>To Whom</u>	<u>Amount</u>	<u>Purpose</u>
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The following shall be paid, initially from funds provided by Jonathan Russell, then from cash collateral.

Union Bank & Trust	\$1,026.88 per month	2015 Ford F-350
TD Auto	\$2,083.40 per month	Two vehicle loans (
Trans Lease	\$1,637.46 per month	Two equipment leases
Evans & Mullinix	\$10,000.00 per month	Attorney Fees
US Trustee	To be determined	Quarterly Fees

The following shall be paid from the cash collateral

Rain and Hail	\$210,552.00.00	2017 Crop Insurance
Riley's Tire	\$6,000.00 (Approx)	Tire Repairs
Foley Equipment	\$12,542.61	Semi Repairs
Miscellaneous Parties	\$38,000.00	Labor and fuel to haul rest of grain,